

PERMITTING DIVISION
DEC 4 12 15 PM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: ALCAN INGOT + POWDERS

EPA I.D. NUMBER:

NJD 0685815771

COMPANY ADDRESS: 901 LEHIGH AVENUE, UNION, N.J.

COMPANY CONTACT OR OFFICIAL:

PETER E. ROGERS

INSPECTOR'S NAME:

KEN GIGLIELLO

TITLE: DIVISION SAFETY COORDINATOR

BRANCH/ORGANIZATION:

SURVEILLANCE & MONITORING BRANCH

CHECK IF FACILITY IS ALSO A TSD

FACILITY

☒

DATE OF INSPECTION:

11/5/81

YES

NO

DC
KN

(1) Is there reason to believe that the facility has hazardous waste on site?

☒

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☐ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

YES	NO	DON'T KNOW
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- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

—	✓	—
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Please explain:

- c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

* SEE ATTACHED SHEETS ON TSD REPORT

- d. Describe the activities that result in the generation of hazardous waste.

* SEE ATTACHED SHEETS ON TSD REPORT

- (2) Is hazardous waste stored on site?

✓	—	—
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- a. What is the longest period that it has been accumulated?

5 MONTHS

- b. Is the date when drums were placed in storage marked on each drum?

✓	—	—
---	---	---

- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

Two shipments

✓	—	—
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- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?

Two

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

✓	—	—
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- b. If "no" or "don't know," please elaborate.

	<u>YES</u>	<u>NO</u>	<u>DON KNOW</u>
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	<u>✓</u>	<u>—</u>	<u>—</u>
- the generator's name, mailing address, telephone number, and EPA identification number	<u>✓</u>	<u>—</u>	<u>—</u>
- the name, and EPA identification number of each transporter	<u>✓</u>	<u>—</u>	<u>—</u>
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	<u>N/A</u>	<u>—</u>	<u>—</u>
- a description of the wastes (DOT)	<u>✓</u>	<u>—</u>	<u>—</u>
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	<u>✓</u>	<u>—</u>	<u>—</u>
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	<u>✓</u>	<u>—</u>	<u>—</u>
(5) Were there any hazardous wastes stored on site at the time of the inspection?	<u>✓</u>	<u>—</u>	<u>—</u>
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	<u>✓</u>	<u>—</u>	<u>—</u>
b. If not properly packaged or in secure tanks, please explain.	<u>N/A</u>	<u>—</u>	<u>—</u>
c. Are containers clearly marked and labelled?	<u>✓</u>	<u>—</u>	<u>—</u>
d. Do any containers appear to be leaking?	<u>—</u>	<u>✓</u>	<u>—</u>
e. If "yes," approximately how many?			

* (6) Has the generator submitted an annual report to EPA covering the previous calendar year? N/A

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? ✓

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

1. SHIPMENTS OF HAZARDOUS WASTE:

NOVEMBER, 1981

40 DRUMS - WATER SLUDGE

36 DRUMS - FLOOR SWEEPS

TRANSPORTER - ENVIRONMENTAL TRANSPORT, FLANDERS, N.J.

T, S, D - CECOS, NIAGARA FALLS

MAY, 1981

1500 GALLONS - AL POWDER SLUDGE

1500 GALLONS - AL FLOOR SWEEPS

50 GALLONS - TOLUENE } DISCARDED RAW MATERIAL

50 GALLONS - XYLENE }

TRANSPORTER - SANITARY WASTE CARRIERS, KEARNY, N.J.

T, S, D - MODERN TRANSPORTATION, KEARNY, N.J.

* The effective date for this requirement is March 1, 1982.

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: ALCAN INGOT/POWDERS EPA I.D. Number: NJD 0685815771

COMPANY ADDRESS: 901 LEE HIGH AVENUE

COMPANY CONTACT OR OFFICIAL:

OTHER ENVIRONMENTAL PERMITS HELD

PETER ROGERS

BY FACILITY: ☐ NPDES

TITLE:

☐ AIR

DIVISION SAFETY COORDINATOR

☐ OTHER

INSPECTOR'S NAME:

DATE OF INSPECTION:

KEN GIGLIELLO

11/5/81

BRANCH/ORGANIZATION:

TIME OF DAY INSPECTION TOOK PLACE:

9:30 A.M.

SURVEILLANCE + MONITORING BRANCH

(1) Is there reason to believe that the facility has hazardous waste on site?

YES

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☐ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

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☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

YES NO DON'T KNOW

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

YES

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

*** SEE ATTACHED SHEETS**

(2) Does the facility generate hazardous waste?

YES

(3) Does the facility transport hazardous waste?

YES

(4) Does the facility treat, store or dispose of hazardous waste?

YES

STORAGE ONLY

VISUAL OBSERVATIONS

- | | <u>YES</u> | <u>NO</u> | <u>DON'T
KNOW</u> |
|---|-------------------------------------|--------------------------|-----------------------------|
| (5) <u>SITE SECURITY</u> (§265.14) | | | |
| a. Is there a 24-hour surveillance system? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Is there a suitable barrier which completely surrounds the active portion of the facility? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| (6) Are there ignitable, reactive or incompatible wastes on site? (§265.27) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a. If "YES", what are the approximate quantities? | | | IGNITABLE - 32 DRUMS |
| b. If "YES", have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. If "YES", explain | * SEE ATTACHED SHEETS | | |
| d. In your opinion, are proper precautions taken so that these wastes do not: | | | |
| - generate extreme heat or pressure, fire or explosion, or violent reaction? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| - produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| - produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| - damage the structural integrity of the device or facility containing the waste? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| - threaten human health or the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Please explain your answers, and comment if necessary.

- e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility? **No**
- (7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32) **YES**

- | | YES | NO | DON'T
KNOW |
|---|-----|----|---------------|
| - an internal communications or alarm system? | ✓ | — | — |
| - a telephone or other device to summon emergency assistance from local authorities? | ✓ | — | — |
| - portable fire equipment? | ✓ | — | — |
| - adequate aisle space? <i>FIELD OBSERVATION</i> | ✓ | — | — |
| - in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. | ✓ | — | — |

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

REQUIRE ALL PROCEDURES

- *(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? *N/A*

If you have, please comment, as appropriate.

- (9) a. Is there any reason to believe that groundwater contamination already exists from this facility? *✓*
If "YES", explain.

- b. Do you believe that operation of this facility may affect groundwater quality? *✓*

- c. If "YES", explain.

Analyze on-site wells used for production.

RECORDS INSPECTION:

- (10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? *✓*

- a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? *N/A*

- b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)

- c. Does each manifest (or a representative sample) have the following information?

- a manifest document number

* This requirement applies only after November 19, 1981.

YES NO DON'T
KNOW

- the generator's name, mailing address, telephone number, and EPA identification number
 - the name, and EPA identification number of each transporter
 - the name, address and EPA identification number of the designated facility and an alternate facility, if any;
 - a DOT description of the wastes
 - the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle
 - a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA
- d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.

N/A

✓

(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)

✓

- a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?
(You may check more than one)
Waste characteristics vary _____
All wastes are basically the same ✓
Company treats all waste as hazardous _____
Don't Know _____

- b. Does hazardous waste come to this facility from off-site sources?

✓

- c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?

N/A

(12) INSPECTIONS (§265.15)

- a. Does the facility have a written inspection schedule?
- b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?
- c. Does the owner/operator record inspections in a log?
- d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.

✓

✓

✓

✓

(13) PERSONNEL TRAINING (\$265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? ☒ ☐ ☐
- type and amount of training to be given to personnel in jobs related to hazardous waste management? ☒ ☐ ☐
- actual training or experience received by personnel? ☒ ☐ ☐

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? ☒ ☐ ☐
(\$265.51)a. Does the plan describe arrangements made with local authorities? ☒ ☐ ☐b. Has the contingency plan been submitted to local authorities? ☐ ☒ ☐How do you know? *HOWEVER, LOCAL FIRE DEPARTMENT**ROUTINELY CHECKS ON PLANT AT COMPANY REQUEST*c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? ☒ ☐ ☐d. Does the plan have a list of what emergency equipment is available? ☒ ☐ ☐e. Is there a provision for evacuating facility personnel? ☒ ☐ ☐f. Was an Emergency Coordinator present or on call at the time of the inspection? ☒ ☐ ☐

(15) Does the owner/operator keep a written operating record with: (\$265.73)

- a description of wastes received with methods and dates of treatment, storage or disposal? ☒ ☐ ☐
- location and quantity of each waste? ☒ ☐ ☐
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? ☒ ☐ ☐
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? ☒ ☐ ☐

*(16) Does the facility have written closure and post-closure plans? (\$265.110) ☒ ☐ ☐

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable) and ultimately closed? ☒ ☐ ☐

- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility? ☒ ☐ ☐
- a description of the steps necessary to decontaminate facility equipment during closure? ☒ ☐ ☐
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed? ☒ ☐ ☐
- b. What is the anticipated date for final closure? 1987 ☒ ☐ ☐
- tc. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities? ☒ ☐ ☐
- d. Does the written post-closure plan include:
 - a description of planned groundwater monitoring activities and their frequencies during post-closure? ☒ ☐ ☐
 - a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure? ☒ ☐ ☐
 - the name, address and phone number of a person or office to contact during post-closure? ☒ ☐ ☐
- *(17) Does the owner/operator have a written estimate of the cost of closing the facility? (\$265.142) What is it? ☒ ☐ ☐
- *(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (\$265.144) ☒ ☐ ☐
- *(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (\$265.90) ☒ ☐ ☐
- a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area? ☒ ☐ ☐
- b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area? ☒ ☐ ☐

N/A
NONE OF THE ABOVE

* This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

<u>STORAGE</u>	<u>TREATMENT</u>	<u>DISPOSAL</u>
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
<u>Container p. 7</u>	Incineration pp. 12-13	Surface Impoundment p. 8
<u>Tank, above ground p. 8</u>	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	YES NO DON'T KNOW
	Other _____	

CONTAINERS (\$265.170)

1. Are there any leaking containers?
If "YES", explain. ___ ☒ ___
2. Are there any containers which appear in danger of leaking?
If "YES", explain. ___ ☒ ___
3. Do wastes appear compatible with container materials? ___ ☒ ___
4. Are all containers closed except those in use? ___ ☒ ___
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak? ___ ☒ ___
6. How often does the plant manager claim to inspect container storage areas?
WEEKLY, ___ ☒ ___
7. Does it appear that incompatible wastes are being stored in close proximity to one another?
If "YES", explain. ___ ☒ ___
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? ___ ☒ ___
9. What is the approximate number and size of containers with hazardous wastes?

32 - 55 Gallon Drums

TANKS (\$265.190)

YES	NO	DON'T KNOW
-----	----	------------

1. Are there any leaking tanks?
If "YES", explain.

Two 6,000 Gallon Tanks

2. Are there any tanks which appear in danger of leaking.
If "YES", explain.

3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail?
If "YES", explain.

4. Do uncovered tanks have at least 2 feet of freeboard on an adequate containment structure?

Large dike structure

5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?

N/A

6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank?
If "YES", explain.

7. How often does the plant manager claim to inspect container storage areas?

WEEKLY

8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?
If "YES", explain.

9. What is the approximate number and size of tanks containing hazardous wastes?

2 - 6,000 Gallon Tanks. No sign on this area.

SURFACE IMPOUNDMENTS (\$265.220)

1. Is there at least 2 feet of freeboard in the impoundment?

2. Do all earthen dikes have a protective cover to preserve their structural integrity?
If "YES", specify type of covering.

3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment?
If "YES", explain.



I GENERAL INFORMATION:

- 24 HOUR/DAY, 7 DAYS/WEEK. $\frac{1}{3}$ CAPACITY NOW.
- 85 EMPLOYEES
- AT THIS LOCATION SINCE 1928.

II PRODUCTS

- PIGMENTS (ALUMINUM, BRASS ALLOYS)
- POWDERS (COPPER, ALUMINUM, BRONZE, TIN)
- SPECIALTY METALS (SMALL SCALE ALLOY MANUFACTURE)

III PROCESS

1. BRASS ALLOY PIGMENT \rightarrow DRY BALL MILL \rightarrow FLAKES
2. ALUMINUM PIGMENT \rightarrow ATOMIZE SPRAY PARTICLES \rightarrow POWDERS
POWDERS \rightarrow WET BALL MILL \rightarrow PASTY PIGMENT
 \downarrow \downarrow
SOLVENT USED BY PAINT INDUSTRY
3. TIN / COPPER POWDERS \rightarrow DRY BALL MILL
4. BRONZE \rightarrow ATOMIZE \rightarrow POWDER \rightarrow FILTER
5. NON-CONTACT COOLING WATER USED IN MACHINERY IS RECYCLED WITHIN PLANT.



IV GENERATION OF HAZARDOUS WASTE:

- ALUMINUM BEARING OPERATION → IGNITABLE AND REACTIVE WASTE BOTH.
- SOURCES:
 1. COOLING TOWER SLUDGE - COOLING FROM BALL MILL OPERATION
 - USED TO CLEAN OUT COOLING TOWER ONCE/YEAR ~ 40 DRUMS.
 - COMPOSITION: 40% ALUMINUM, 55% - WATER, 3% - MINERAL SPIRITS, 1% - FATTY ACIDS, 1% - ALUMINUM SOAPS
 - CLASSIFY AS D001 → IGNITABLE
 - ~ 3-4 DRUMS IN COOLING TOWER CURRENTLY.
 2. FILTER LEAVES - COTTON CLOTH WITH DRY ALUMINUM FLAKE / HYDROCARBON FLAKE.
 - CLASSIFY AS D001.
 - ~ 5-6 DRUMS / YEAR.
 3. SCRAP ALUMINUM / PASTE / OFF-SPEC MATERIAL
 - COMPOSITION: 65% AL, 34% MINERAL SPIRITS, 1% - FATTY ACIDS
 - VARIABLE AMOUNT DEPENDING ON PROCESS, ~ 5000 LB/YEAR.
 4. FLOOR SWEEPS
 - VARIABLE DEPENDING ON SPILLS / CLEANING
 - ROUGH ESTIMATE 100 DRUMS / YEAR.



5. ALUMINUM CONTAMINATED GREASE FROM MACHINERY:
- NORMAL GARBAGE REMOVAL COMPANY REFUSES TO ACCEPT THIS WASTE FOR DISPOSAL.
 - AT 100% PRODUCTION, ONE 55 GALLON DRUM/WEEK.
6. MINERAL SPIRITS - GENERATE FROM ALUMINUM PROCESS WET MILLING OPERATION. SOLVENT IS DRAWN OFF IN A BATCH AS WASTE SOLVENT. STOKED IN TWO 6,000 GALLON TANKS.
- USED TO TRANSPORT TO SOLVENTS RECOVERY FOR RECLAMATION. HOWEVER, THEY NO LONGER ACCEPT THIS WASTE FOR RECOVERY. ~5,000 GALLONS/YEAR.

V HAZARDOUS WASTE STORAGE AREAS:

AREA #1

- LOCATED ALONG SIDE OF BUILDING OUTSIDE.
- 32 DRUMS ALL IN GOOD CONDITION, LABELED/DATED WITH HAZARDOUS WASTE LABELS.
- SANDBAGS PLACED AROUND DRUMS. AISLE SPACE ADEQUATE
- DIRECTIONS IN CASE OF A SPILL AT STORAGE AREA
- "FLAMMABLE" AND "DANGER- UNAUTHORIZED SIGNS" POSTED.
- FIRE SUPPRESSANT ATTACHED TO BUILDING ADJACENT TO STORAGE AREA.



II AREA #2

- TWO 6,000 GALLON STORAGE TANKS FOR WASTE SOLVENT.
- NO FLAMMABLE OR DANGER SIGNS POSTED.
- DIKE STRUCTURE ~3 FT. AROUND TANKS.

VI GENERAL COMMENTS

- COMPANY IS VERY AWARE OF POTENTIAL EXPLOSIVE NATURE OF ALUMINUM AND WATER REACTIONS.
 1. TREAT ENTIRE PLANT AS A POSSIBLE IGNITION SOURCE.
 2. SEAL ALL CONTAINERS TO PREVENT MOISTURE FROM ENTERING AND POSSIBLY CAUSING A REACTION
 3. CONTINGENCY PLANS AVAILABLE.
 4. USE EXPLOSION-PROOF ELECTRICAL CIRCUITS IN PROCESS OPERATIONS.
 5. TREAT HAZARDOUS WASTE IN THE SAME CAREFUL MANNER AS PROCESS COMPOUNDS TO PREVENT IGNITION.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3C

DATE: November 25, 1981

SUBJECT: RCRA Inspection Forms

FROM: Richard D. Spear, Chief
Surveillance & Monitoring Branch

TO: Richard A. Baker, Chief
Permits Administration Branch

THRU: Barbara Metzger, Director
Environmental Services Division

The enclosed RCRA Inspection Forms have been completed by the Edison Office of the U.S. Environmental Protection Agency:

New Jersey

Alcan Ingot & Powders
Union, N.J.
NJD0685815771

Dart Industries
Neshanic Station, N.J.
NJD046956892

Lily Tulip
Holmdel, N.J.
NJD002164176

Kopper Company
Newark, N.J.
NJD002149789

4 Enclosures

DEC 4 12 35 PM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

* (6) Has the generator submitted an annual report to EPA covering the previous calendar year?

N/A

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

✓

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

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TRANSPORTER - SANITARY WASTE CARRIERS, KEARNY, N.J.

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* The effective date for this requirement is March 1, 1982.



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- SPECIALTY METALS (SMALL SCALE ALLOY MANUFACTURE)

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POWDERS \rightarrow WET BALL MILL \rightarrow PASTY PIGMENT
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SOLVENT USED BY PAINT INDUSTRY
3. TIN/COPPER POWDERS \rightarrow DRY BALL MILL
4. BRONZE \rightarrow ATOMIZE \rightarrow POWDER \rightarrow FILTER
5. NON-CONTACT COOLING WATER USED IN MACHINERY IS RECYCLED WITHIN PLANT.



IV GENERATION OF HAZARDOUS WASTE:

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- CLASSIFY AS D001 → IGNITABLE

- ~ 3-4 DRUMS IN COOLING TOWER CURRENTLY.

2. FILTER LEAVES - COTTON CLOTH WITH DRY ALUMINUM FLAKE / HYDROCARBON FLAKE.

- CLASSIFY AS D001.

- ~ 5-6 DRUMS / YEAR.

3. SCRAP ALUMINUM / PASTE / OFF-SPEC MATERIAL

- COMPOSITION: 65% AL, 34% MINERAL SPIRITS, 1% - FATTY ACIDS

- VARIABLE AMOUNT DEPENDING ON PROCESS, ~ 5000 LB / YEAR.

4. FLOOR SWEEPS

- VARIABLE DEPENDING ON SPILLS / CLEANING

- ROUGH ESTIMATE 100 DRUMS / YEAR.



5. ALUMINUM CONTAMINATED GREASE FROM MACHINERY:

- NORMAL GARBAGE REMOVAL COMPANY REFUSES TO ACCEPT THIS WASTE FOR DISPOSAL.

- AT 100% PRODUCTION, ONE 55 GALLON DRUM/WEEK.

6. MINERAL SPIRITS - GENERATE FROM ALUMINUM PROCESS

WET MILLING OPERATION. SOLVENT IS DRAWN OFF

IN A BATCH AS WASTE SOLVENT. STORED IN TWO 6,000 GALLON TANKS.

- USED TO TRANSPORT TO SOLVENTS RECOVERY FOR RECLAMATION. HOWEVER, THEY NO LONGER ACCEPT THIS WASTE FOR RECOVERY. ~5,000 GALLONS/YEAR.

V HAZARDOUS WASTE STORAGE AREAS:

AREA #1

- LOCATED ALONG SIDE OF BUILDING OUTSIDE.

- 32 DRUMS ALL IN GOOD CONDITION, LABELED/DATED WITH HAZARDOUS WASTE LABELS.

- SANDBAGS PLACED AROUND DRUMS. AISLE SPACE ADEQUATE

- DIRECTIONS IN CASE OF A SPILL AT STORAGE AREA

- "FLAMMABLE" AND "DANGER - UNAUTHORIZED SIGNS" POSTED.

- FIRE SUPPRESSANT ATTACHED TO BUILDING ADJACENT TO STORAGE AREA.



II AREA #2

- TWO 6,000 GALLON STORAGE TANKS FOR WASTE SOLVENT.
- NO FLAMMABLE OR DANGER SIGNS POSTED.
- DIKE STRUCTURE ~3 FT. AROUND TANKS.

III GENERAL COMMENTS

- COMPANY IS VERY AWARE OF POTENTIAL EXPLOSIVE NATURE OF ALUMINUM AND WATER REACTIONS.
 1. TREAT ENTIRE PLANT AS A POSSIBLE IGNITION SOURCE.
 2. SEAL ALL CONTAINERS TO PREVENT MOISTURE FROM ENTERING AND POSSIBLY CAUSING A REACTION
 3. CONTINGENCY PLANS AVAILABLE.
 4. USE EXPLOSION -PROOF ELECTRICAL CIRCUITS IN PROCESS OPERATIONS.
- TREAT HAZARDOUS WASTE IN THE SAME CAREFUL MANNER AS PROCESS COMPOUNDS TO PREVENT IGNITION.

EPA

30

DWM-329

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Alcan Powders & Pigments
FILE NUMBER: 20-19-52
VHT FACILITY FILE NUMBER: _____
PERMIT #: _____
REGION: M
INSPECTION DATE: 8/15/89 - 8/16/89
INCIDENT/CASE NUMBER: _____
INSPECTION TYPE: Generator - Land Ban
RESPONSIBLE AGENCY CODE: _____
INSPECTOR'S NAME: Dan Burgoyne
INSPECTOR'S AGENCY: DEP / DHWM
INSPECTOR'S BUREAU: MFO
EPA ID NUMBER: NJD 065815771
ADDRESS: 901 Lehigh Ave.
Union, N.J. 07083
LOT: 4 BLOCK: 504
COUNTY: Union
FACILITY PERSONNEL: Mr Marty Catapone
TELEPHONE #: (201) 851-4558
OTHER STATE/EPA PERSONNEL: _____
REPORT PREPARED BY: Dan Burgoyne
REVIEWED BY: DAsterling
DATE OF REVIEW: 9/18/89

8/15 & 8/16/89
↓ ↓
TIME IN: 0830 0830

TIME OUT: 1630 1030

PHOTOS TAKEN () YES (X) NO

IF YES, HOW MANY? _____

SAMPLE TAKEN () YES (X) NO

NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (X) YES () NO

Number of manifests in compliance 34

Number of manifests not in compliance 0

List manifest document numbers of those manifests not in compliance.

SUMMARY OF FINDINGS

-A1-

FACILITY DESCRIPTION AND OPERATIONS:

On 8/15 and 8/16/89 I conducted an inspection of Alcan Powders and Pigments located at 901 Lehigh Avenue, Union, N.J. The purpose of the inspection was to determine compliance with hazardous waste generator regulations as established under N.J.A.C. - 7:26-1 et seq. The inspection also involved determination of compliance with U.S.E.P.A. land ban restrictions.

At the facility I met with Mr. Marty Catapane, the Shipping/Traffic Supervisor who has also inherited environmental affairs responsibility. I explained to Mr. Catapane the purpose of the visit and what the inspection would entail. Mr. Catapane explained that Alcan Powders and Pigments is a Division of Alcan Aluminum Corporation, and has been at this location for approximately 60 years. The facility employs approx. 70 people and the plant operates 3 shifts - 7 days a week.

At present the facility manufactures copper, bronze and tin powders and produces a few specialty products containing magnesium and silicon, and nickel and silver all flake particles / powders. The facility previously use to manufacture aluminum paste and an aluminum powder product, but this production has been moved to Alcan's Illinois facility. The facility is currently going through an EPA site clean-up, this has been going on for approximately 1 year.

FACILITY DESCRIPTION AND OPERATIONS (continued):

SUMMARY OF FINDINGS

-A2-

Ground water monitoring wells have been installed and O'Brien & Gere (an environmental consultant has been contracted with for these purposes. Underground storage tanks have been removed and areas cleaned, equipment dismantled, cleaned and removed for work areas which were associated with aluminum paste and powder production. The ground water was determined to be contaminated with mineral spirits and the clean-up is being monitored by ECHA. According to Mr. Catapane the mineral spirits contamination was most likely due to leaking underground storage tanks which were removed as a result of the elimination of the aluminum production. Mr. Catapane gave me an overview and complete inspection of the processes. The first area inspected was the Copper powder manufacturing process which takes place in Building #3. Here, scrap copper bunched together in blocks is melted down in a furnace run at 3000°F, the molten copper is poured into a high pressure water stream (2000 psi) as a result the copper becomes atomized or sprayed into fine particles, this mixture then goes through a filter to reduce matter. The copper is now in powder form. This activity takes place on the 2nd floor of Bld #3. Also on the 2nd floor the wet copper powder goes through a drier, then into a filter cloth which is rotated and shot with air in order to remove excess

FACILITY DESCRIPTION AND OPERATIONS (continued):

SUMMARY OF FINDINGS

-A3-

Liquid, the powder then goes into a settling tank, from there the powder is run on to a furnace conveyor belt where it goes through the furnace for additional drying at 1700°F. At the end of the belt the copper cake is transte into the basement for crushing. After crushing the powder is screened on portable screens located on the 1st floor. After screening the powder is collected into hoppers. From the hoppers the powder is conveyed to a blender located on the 1st floor. From the blender the retorted powder is poured into finished drums. According to Mr. Catapane the facility processes approximately 750,000 - 1,000,000 lbs of Cu./month. There is a baghouse which collects particulate from the press to eliminate copper particulate from being dispersed throughout the building. Prior to conducting the inspection I reviewed DEQ - air pollution information and found that the facility is routinely inspected by A.P.C. as part of their air pollution data system inspection schedule. The A.P. ID # 40055 has been assigned this facility and there are 43 sources of emission on record either permitted or grandfathored. The next process area inspected was the tin manufacturing plant located in Building #17. Here tin ingots are melted down in a furnace at 800°F and poured into a high pressure air stream at 200 psi, the tin particula is blown by air stream

and sucked into a vacuum system, collected via the baghouse collection system, the tin fines are shaken from the bags within the baghouse and collected in a drum. The plant processes between 100,000-150,000 lbs/month. Bronze manufacturing takes place in Building #17 cut pieces of copper wire are melted in a small electric furnace to 2000°F, at this point tin is melted from an ingot and added to the copper forming bronze the particles are shot into a high pressure air stream between 215-220 psi and shot to a vacuum chamber which feeds a baghouse. The bags are shaken and the bronze peroxide is collected in a drum. Drums are put over a screening device, the screened particles are put into a blender and then drummed for final product. Larger particles go ball into the system. The drummed final products from each process are stored in the facility warehouse (Bldg #2). At this time no activity was taking place. The next work area inspected was the specialty product area found in Building #11. The first process observed was the Anthony powder production equipment. Mr. Catapone informed me that an Anthony is first crushed to 2" rocks and carried by a small conveyor to a Hammermill. The Hammermill breaks the rocks to finer particles, and then sends the fines to a hopper apparatus. From the hopper the fines are sent through a pulverizer which is a smaller version of the hammermill. The pulverized fines are

are then screened and the finer particles are then drummed and shipped to the warehouse for sale. The silver and nickel specialty product are pumped into a hammer mill with mineral spirits as a slurry. The slurry is pumped into a filter press, the mineral spirits are collected in a vat to be reused. After 24 hours in the filter press the material is 95% dry powder. The powder is then sent through a vacuum drier. The powder is then put on to metal trays and placed into a steam jacketed unit, here excess mineral spirits are driven off, the mineral spirit gases are sent through a condenser and the liquid is paled and reused. The powder is screened over a sieve and collected in a drum and sent to the warehouse for shipping. According to Mr. Carpenter small quantities of mineral spirits are used approximately 100-200 gals/week.

The metal powder produced at this facility ^{used in industry (auto)} are for the manufacture of gas filters, engine bearings, small gears and sprockets, and brushes for electric motors. Skag metal skimmings and contaminated copper are sold to scrap dealers and either reclaimed or recycled. The dealers are The Heimer Bros. of Philadelphia and Goldberg and Son of Pa. Mineral spirit waste is shipped as a hazardous waste classified as D001. Building is a machine shop, some oil is

used and some waste is generated and classified as (X776). The shop has a drill press, 2 lathes, a band saw, a milling machine, and a pipe threading machine. Building #10 is now out of service as of 7/87 which was where aluminum paste and powder production also took place, there was also a testing laboratory housed here when the plant was active. The various laboratory chemicals were either shipped to the Illinois facility or discarded as hazardous waste. Various hazardous waste types were shipped off site as lab packs to Advanced Environmental Technology Corporation. AETC also handles the facilities Dool (mineral spirit) and X776 (waste oil) waste generated. Mr. Catapane stated that there are 8 underground storage tanks on the west side of BLD #6 under the driveway which will be removed. At present the tanks are empty. On the south side of the facility is a small tank farm within a concrete containment wall. These tanks are presently out of service and use to contain mineral spirits when the Aluminum Reduction plant was running. The tank farm consists of 3 - 10-12,000 gal. storage tanks and one - 8,000 gal. storage tank according to Mr. Catapane. Mr. Catapane went on to say that large quantities of mineral spirit was used for the manufacture of aluminum paste. Near BLD #10 is the Boiler Room which

contains 3 natural gas boilers.
The hazardous waste storage area is located
outside just south of the warehouse BLD #2,
at this time 35-55 gal drums of hazardous waste
was stored, all 2001 waste type. The drums were
all in good condition, properly labeled, sufficient
aisle space, closed, and not in danger of leaking.
The waste was not stored in excess of 90 days
according to the listed accumulation start dates.

After completing the site inspection, returned
to Mr. Catapone's office, he introduced me to Tom
Lair - Alcon's Project Engineer. I asked Mr. Lair
as to the wastewater system at the facility and the
on-going ECHA project taking place at this time.

Mr. Lair stated that the facility has a combined sewer
system presently discharging to Joint Meeting of Union /
Essex. Joint Meeting checks the wastewater effluent
for metals. A project is underway which will be
monitored by Joint Meeting to separate the sewer system
into a single sanitary line and single storm sewer
line. Recon Systems Inc. has been contracted with to
do this project for Alcon.

Mr. Lair stated that as to the ECHA
project, underground storage tanks will have to be
removed, 2 Brian and Gene the env consultants
are taking ground water samples, soil samples, and

Monitoring the ground water wells.

After going through the interview with Mr. [redacted]

I reviewed the facility's manifests for 1987, 1988, and

1989, 34 manifests were reviewed for those 3 years.

The manifests were all complete and signed, some

of the manifests however which were utilized for

land ban restricted wastes failed to have the paper

land ban restriction notices as required

by USEPA.

I requested to see laboratory analysis information,

Mr. Catapone stated he recently picked up the environmental

responsibilities from a person who recently left and was

not sure where the analysis data could be found. He stated

that the lab pack wastes were known contaminants

and were known to be a hazardous waste if discarded. None

was MSDS information regarding the laboratory chemicals

used at the facility, but info. concerning the Dool mineral spirit

waste stream was unavailable.

On 8/16/89 I returned to the facility and

met with Mr. Catapone once again to complete the

enforcement checklists. The following AITDF violations

were observed and written:

7.26-8.5(d) Facility failed to maintain waste analysis info.

for hazardous waste manifested offsite for 3 years.

7.26-7.4 (e) Same violation as written above (should be

revised since violation is identical to 7.26-8.5(d))

7.26-9.6 (f) Facility failed to arrange biannual inspections

with the local fire dept.

-B-

Describe the activities that result in the generation of hazardous waste.

Various lab pack materials were removed in 1987 and 1988 as part of closure of a laboratory (BLD #6) on site.

Waste continued to be generated on site is mineral spirits (D001) from specialty product production
Machine shop oil (X726)

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

25 - 55 gal drums of mineral spirit waste (D001)

GENERAL

GENERAL CHECKLIST

		YES	NO	N/A
7:26-7.4(a)1	Does the Generator have an EPA ID number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HAZARDOUS WASTE DETERMINATION				
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon <u>knowledge of process</u> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Is the waste hazardous?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4i	The generator's name, address and phone number.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4ii	The generator's EPA ID number.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4vi	The TSF's EPA ID number.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4vii	The name, address and phone number of the designated TSD facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4viii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓	—	—
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	—	—	✓
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	—	—	—
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓	—	—
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓	—	—
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓	—	—
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓	—	—
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓	—	—
7:26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	—	✓	—
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓	—	—
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	—	—	✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	—	—	✓

7:26-9.3

Accumulation Time

How is waste accumulated on site?

- ☒ Containers
☐ Tanks (greater than 90 days)
 (complete HWMF (TSD) Facility Checklist)
☐ Tanks (less than 90 days)
☐ Above ground
☐ Below ground
☐ Surface impoundments
 (complete HWMF (TSD) Facility Checklist)
☐ Piles (complete HWMF checklist)

YES NO N/A

7:26-9.3(a)1

Is waste accumulated for more than
90 days?

YES NO N/A
 _____ ✓ _____

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS
FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

<u>Containers</u>	<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone).		
	<i>25- 55 gallon drums of ign. based on 0001 ignitable haz. waste (mineral spirits)</i>		
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	If no, describe the problem (include number of containers involved.)		
7:26-9.4(d)4i	Are all containers securely closed except those in use?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(d)4iii	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?		
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> (all 0001)
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(d)5	Is the container storage area inspected at least daily?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?		
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?		
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

YES NO N/A

7:26-7.2(b) Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)

Tanks (Less than 90 day storage)

7:26-9.3(b) Does the generator accumulate hazardous waste on-site in an above ground tank?

If yes, describe the tank(s):

- 1) Capacity _____
- 2) Shell thickness _____
- 3) Material Construction _____
- 4) Age of tank _____

7:26-9.3(b) Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?

7:26-9.3(b)1 Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?

7:26-9.3(b)4 Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?

7:26-9.3(b)5 Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?

7:26-9.3(b)6 Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?

7:26-9.3(b)8 If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is secondary containment provided for the below grade part?

7:26-10.5(c)1 Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?

7:26-10.5(c)2 Does the generator use appropriate controls and practices to prevent overfilling?

✓

✓

✓

		YES	NO	N/A
7:26-10.5(c)2ii	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	—	—	✓
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	—	—	—
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	—	—	—
7:26-10.5(d)ii	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	—	—	—
7:26-10.5(d)iii	Does the containment system consist of material compatible with the wastes being stored?	—	—	—
7:26-10.5(d)iiii	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	—	—	—
7:26-10.5(d)iii	Is the tank protected from contact with accumulated liquids?	—	—	—
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	—	—	—
7:26-10.5(d)2	Is run-on into the containment area prevented?	—	—	—
	If not, explain.	—	—	—
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	—	—	—
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	—	—	✓

YES NO N/A

7:26-10.5(d)41	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	—	—	✓
7:26-9.4(g)4	<u>Personnel Training</u> Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	✓	—	—
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	✓	—	—
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	✓	—	—
7:26-9.4(g)61	Is there written documentation of the following: Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	—	✓	—
7:26-9.4(g)611	A written job description for each position related to hazardous waste management?	—	✓	—
7:26-9.4(g)6111	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	✓	—	—
7:26-9.4(g)61v	Documentation of actual training or experience received by personnel?	✓	—	—
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓	—	—

YES NO N/A

7:26-9.6

Preparedness and prevention

Does the facility comply with preparedness and prevention requirements including maintaining:

7:26-9.6(b)1

An internal communications or alarm system?

✓

7:26-9.6(b)2

A telephone or other device to summon emergency assistance from local authorities?

✓

7:26-9.6(b)3

Portable fire equipment, spill control equipment, and decontamination equipment?

✓

7:26-9.6(b)4

Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?

✓

7:26-9.6(c)

Is equipment tested and maintained?

✓

7:26-9.6(d)1

Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?

✓

7:26-9.6(e)

Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?

✓

If no, please explain.

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

✓

Explain.

7:26-9.6(f)

Has the facility made the following arrangements, as appropriate for the type waste handled on site:

7:26-9.6(f)1

Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.

✓

JES M2 N/A

- 7:26-9.6(f)2 Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority? ☒ City of Union has Emergency Response Coordinator
- 7:26-9.6(f)3 Agreements with emergency response contractors, and equipment supplies? ☒ _____
- 7:26-9.6(f)4 Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility? ☒ _____
- 7:26-9.6(f)5 Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? _____ ☒ _____
- 7:26-9.6(f)6 If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record. _____ _____ ☒ _____
- 7:26-9.4(g)8 Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7? _____ ☒ _____
- 7:26-9.4(g)81 If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement? _____ ☒ _____
- 7:26-9.4(g)811 Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements? _____ ☒ _____
- If yes, did the owner operator provide those specific local officials with written approval of the exemption? _____ _____ ☒ _____

7:26-9.7

Contingency Plan and Emergency Procedures

7:26-9.7(a)

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?

☒ _____

7:26-9.7(b)

Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?

☒ _____

7:26-9.7(c)

Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?

☒ _____

7:26-9.7(d)

Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCO) Plan in accordance with N.J.A.C. 7:18-4.1 et seq.

☒ _____

If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?

☒ _____

7:26-9.7(e)

Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?

☒ _____

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?

☒ _____

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?

☒ _____

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary route could be blocked by releases of hazardous waste or fires)?

☒ _____

7:26-9.7(i)

Is a copy of the contingency plan and all revisions to the plan:

1. Maintained at the facility;
2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?

☒ _____☒ _____

7:26-9.7(k)

Is there an employee on site or on call at all times with the responsibility of coordinating all emergency response measures?

☒ _____

[Redacted content]

SUBJECT

FROM

TO

DATE

Confidential - Recommendations

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

CHECKLIST FOR REVIEW OF WASTE ANALYSIS PLANS
FOR COMPLIANCE WITH LAND DISPOSAL RESTRICTIONS

	YES	NO
I. Is a Waste Analysis Plan available for review?	_____	_____✓
If yes and facility is generator with interim status or permit, continue with PART I. A, B and C.		
If yes and facility is Commercial TSD, GO TO PART II.		
If yes and facility is generator treating and disposing of their own waste, GO TO PART II and IV.		
If no and facility is Commercial Transfer Station, GO TO PART III.		
If no and facility is in generator only status, fill out PART I. A and B only.		
A. Has facility determined whether waste is restricted from land disposal based solely on knowledge of waste?	_____	_____✓
If no, GO TO PART IB.		
If yes,		
1. Are any chemicals used in facility's process(es) likely to produce a restricted waste stream(s)?	_____	_____
If yes, explain below.		
2. Are the chemicals used as raw materials?	_____	_____
If yes, list which ones below.		
3. Are solvents used ?	_____	_____
If yes, list which ones below.		
4. Has waste stream changed since the facility made its last determination about land restrictions ?	_____	_____
If yes, explain below.		

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

	YES	NO
5. If generator claims solvent concentration is below action level, are analytical results available?	_____	_____
B. Has facility determined whether waste is restricted from land disposal by testing the waste or waste extract? <i>According to facility, TSD has conducted waste analysis, however not available at facility</i>	✓	_____
If no, facility is not in compliance.		
If yes,		
1. Was the TCLP used?	_____	_____
2. Was the Paint Filter Liquids Test (PFLT) used?	_____	_____
If no to 1 & 2 facility is not in compliance.	_____	_____
3. Has waste stream changed since last analysis?	_____	✓
If yes, explain below.		
C. Does WAP specify how facility will comply with LDR?	_____	_____
For all restricted wastes?	_____	_____
If no, facility is not in compliance.		
II. Review of Commercial TSD WAP.		
A. Does WAP require the facility to analyze the first shipment of each waste type from each client?	_____	_____
B. Does WAP provide means of classifying potentially restricted wastes as:		
1. From off-site source?	_____	_____
2. Facility's own waste?	_____	_____
3. Waste to be shipped off-site?	_____	_____
C. Does WAP state what procedures will be used for periodic waste inspections after first shipment?	_____	_____
D. Are appropriate test methods specified in WAP?	_____	_____
E. Does WAP specify procedures for handling each type of restricted waste listed in manifests received?	_____	_____

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DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

	YES	NO
F. Is latest revision of WAP dated after 8 Jul 1987 ?	_____	_____
G. Does WAP specify that residue of restricted waste will be analyzed ?	_____	_____
H. If off-site treatment facility, does WAP specify that analytical data will be obtained from generator or previous handler of waste ?	_____	_____
I. Additionally, if TREATMENT facility,		
1. Does WAP specify the analysis to be performed on treatment residues ?	_____	_____
2. Does WAP address ALL residues (including those from non-hazardous wastes and non-restricted wastes) as potentially restricted wastes ?	_____	_____
3. Does WAP specify that residues will be evaluated from point of generation ?	_____	_____
4. If facility is INCINERATOR, does WAP specify that restricted DIOXIN wastes F020-F023 and F026-F028 will NOT be accepted ?	_____	_____
J. Additionally, if Off-site Land Disposal Facility,		
1. Does WAP state procedures for testing incoming waste shipments allowing facility to be certain that BDAT standards are met ?	_____	_____
If no, does plan state that customers must supply test results ?	_____	_____
2. Does WAP state that all waste analysis results and certifications will be maintained ?	_____	_____
3. Do operating records show instances of facility rejecting shipments ?	_____	_____
III. Facility is a Commercial Transfer Station		
Does facility store restricted waste for less than ten days ?	_____	_____
If no, requirements of PART II apply.		

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

	YES	NO
If yes, do operating records include		
1. Customer waste analysis results ?	_____	_____
2. Customer notifications ?	_____	_____
3. Customer certifications ?	_____	_____
IV. Facility is Generator treating and disposing of their own waste.		
In addition to requirements of part II,		
A. Is the WAP being implemented for both restricted wastes and their treatment residues ?	_____	_____
B. Does WAP specify that treatment residues will be tested for compliance with BDAT ?		
C. Does WAP specify that non-treated restricted waste will be tested prior to land disposal for BDAT compliance ?	_____	_____
D. Do operating records contain all testing records ?	_____	_____

Inspector: Dan Burgoyne
Address: 2 Batkall Pl.
N. Orange, N.J. 07057
Telephone No: (201) 669-3960

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Alcan Pigments and Powders B. Street (or other identifier) 901 Lehigh Ave.
C. City Union D. State N.J. E. Zip Code 07083 F. County Name Union
G. Nature of Business; Identification of Operations: SIC Code(s) Mfg of Metal Powder (Cu, Sn, Bronze)
H. EPA ID # NTD 065815771
I. Handler Contact (Name and Phone Number) Mr. Marty Catapano 701-851-4558

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) ~~P001, P002, P004, or P005~~ Lab pack ☒ Yes ☐ No
(ii) P003 ☐ Yes ☒ No

If an P003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?
☐ Yes ☐ No

b. Source of the above: Form 8700-12 ☐; Part A ☐; Part B ☐; Biennial/Annual Reports ☐
other (specify) ☒ manifests

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating P-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that P-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: _____

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☐ Yes ☒ No
(ii) F028 ☐ Yes ☒ No

[F-solvent BD&T standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 Lab pack chemicals ☒ Yes ☐ No
(ii) D004 - D011 ☒ Yes ☐ No

- Lab Pack D005 - Lead, D009 mercury
D007 - Chromium
b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☐ Yes ☐ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ☒ Yes ☐ No

- P092 phenylmercury acetate
d. Has the generator conducted the paint filter test (Method 9095) [§268.32(1)]? ☒ Yes ☐ No*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☒ Yes ☒ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? ☐ Yes ☒ No

properties of chemicals
either known solids or
liquids

testing by TSD
records not available
for review

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

No records on site as to waste analysis

- f. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:

NO

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:

P092 phenylmercuric acetate

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☒ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☒ No*

- e. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

N/A



B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☒ No

2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☐ Yes ☒ No*

N/A

∴ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

3. P Solvents - -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

____ Yes ____ No*

N/A

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

____ Yes ____ No*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?

____ Yes ____ No*

- b. Does the facility handle K061 wastes?

____ Yes ____ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?

____ Yes ____ No*

- c. Does the facility handle K101 or K102 wastes?

____ Yes ____ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

____ Yes ____ No*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

____ Yes ____ No

⌚ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☒ Yes ☐ No

(i) List wastes for which "applied knowledge" was used:

D601 - mineral spirits
and various lab pick items discarded

b. TCLP ☐ Yes ☐ No

(i) List wastes for which "TCLP" was used:

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☐ No

d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

could have
been by
TSD however
no records
available as
to type of
analytical testing
by TSD.

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

See previous
Comments on
Gen-5



e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?
_____ Yes _____ No*

2. Did the restricted wastes exceed applicable treatment group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: _____

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]
_____ Yes* _____ No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite?
_____ Yes _____ No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
_____ Yes _____ No

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ☒ Yes _____ No*

(ii) Corresponding treatment standard? _____ Yes ☒ No*

(iii) Manifest number? ☒ Yes _____ No*

(iv) Waste analysis, if available? _____ Yes ☒ No

N/A



Some lab pack
items which are
land ban restricted
waste types didn't
have land ban
treatment notices
e.g. D002
D008
D009

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

Identify offsite treatment facilities AETC
Advanced Environmental Technology Corporation
Flombers, N.T.

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:
- (i) EPA hazardous waste I.D. number? ☐ Yes ☐ No*
- (ii) Corresponding treatment standard? ☐ Yes ☐ No*
- (iii) Manifest number ☐ Yes ☐ No*
- (iii) Certification regarding waste and that it meets treatment standards? ☐ Yes ☐ No*

Identify land disposal facilities receiving the BDAT certified wastes _____

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
- (iii) All applicable prohibitions? ☐ Yes ☐ No*
- (iv) The manifest number? ☐ Yes ☐ No*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No*

N/A

-/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b):

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ☒ Yes ☐ No*

Applicable prohibitions? ☐ Yes ☒ No*

The manifest number? ☒ Yes ☐ No*

Waste analysis data, where available? ☐ Yes ☒ No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposal in a landfill or surface impoundment [§268.33(f)]? ☐ Yes ☒ No

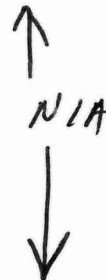
If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ☐ Yes ☒ No*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? ☐ Yes ☐ No*

N/A



Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? ☐ Yes ☐ No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ☐ Yes ☐ No*

N/A



E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☒ No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ☐ Yes ☐ No*

N/A

If yes, TSD Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☒ No

If yes, list type of treatment unit and processes

If yes, TSD checklist must be completed.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
5th Fl., 401 E. State St., Trenton, N.J. 08625

NOTICE OF VIOLATION

ID NO. NJD065815771 DATE 8/16/89
NAME OF FACILITY Alcan Powders & Pigments
LOCATION OF FACILITY 901 Lehigh Avenue, Union, N.J. 07083
NAME OF OPERATOR Mr Marty Catapane

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION 7:26-8.5(d) Facility failed to maintain waste
analysis information for hazardous wastes manifested offsite
for 3 yrs.
7:26-7.4(f) Facility failed to maintain waste analysis records for 3 years.
7:26-9.6(f)5 Facility failed to arrange with local fire dept. biannual
inspections. 7:26-9.4(g)8 Facility failed to conduct semi-annual drills.
7:26-9.4(g)6i Facility failed to provide written job title and name of
employee filling each hazardous waste mgmt position. 7:26-9.4(g)6ii Facility
failed to have a written job description for each position related to hazardous
waste mgmt.

Remedial action to correct these violations must be initiated immediately and be completed by

August 31, 1989. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$25,000 per violation.

Daniel F. Augustine
Investigator, Division of Waste Management
Department of Environmental Protection